

Overstreet, Greg (ATG)

From: msroufe@waleague.org
Sent: Friday, January 06, 2006 4:18 PM
To: Overstreet, Greg (ATG)
Subject: Public Record Comments

The following message was submitted to the Office of Attorney General:

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Comments:

The Honorable Rob McKenna Attorney General, State of Washington 1125 Washington Street SE Olympia, WA 98504-0100 Dear Attorney General McKenna, The Washington Credit Union League is pleased to see these new model rules for public disclosure. These rules will go a long way towards standardizing the records request process throughout Washington State. While the League fully supports the adoption of model rules for public disclosure, it wishes to explain the importance of confidentiality in certain records, both to credit unions and their members. As the regulatory body for credit unions, the Department of Financial Institutions, Division of Credit Unions, has access to and maintains records of consumer data as well as credit union data. Both of these types of data are highly sensitive and must be protected from public disclosure. The Division's duty to regulate credit unions necessarily makes it privy to information regarding the financial integrity of all Washington State chartered credit unions. In the event that a credit union is troubled, the Division works with the credit union to remedy the situation. Public disclosure of the status of a troubled credit union could trigger a run on the credit union. This circumstance would not only be highly likely to result in the failure of a viable credit union, but also put unnecessary stress on the credit union's members as well as State and Federal governments. The public disclosure of consumer financial data would be disastrous. The release of this data would be a field day for criminals. Con artists, identity thieves, and fraudsters are just a few of the criminals that would benefit. Protecting the confidentiality of this type of data is of paramount importance. These model rules are a large step in the right direction as long as in our zeal for regulatory sunshine we do not overlook the legitimate need for the confidentiality of certain records. Thank you for your time and consideration. Mary Sroufe Regulatory Analyst Washington Credit Union League 33301 9th Ave S. Suite 200 Federal Way, WA 98003